

EXHIBIT G

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

THE STATE OF LOUISIANA, By and
through its Attorney General, JEFF
LANDRY, et al.,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, et
al.,

Defendants,

and

HEALTHY GULF, et al.,

Intervenor-Defendants.

Civ. No.: 2:21-cv-00778-TAD-KK

Judge: Terry A. Doughty

Mag. Judge: Kathleen Kay

DECLARATION OF JACQUELINE SAVITZ

I, Jacqueline Savitz, pursuant to the provisions of 28 U.S.C. § 1746, do hereby declare as follows:

1. I am the Chief Policy Officer for North America at Oceana, Inc. (“Oceana”). I have worked with Oceana since 2002 and have been a member of Oceana since December 6, 2005.

2. Oceana is a 501(c)(3) non-profit, international advocacy organization headquartered in Washington, D.C. with regional offices located throughout the United States, including Juneau, Alaska. Oceana is the largest international advocacy organization dedicated solely to ocean conservation, with over 1.2 million members and supporters in the United States,

including nearly 6,000 members in Alaska and over 70,000 members in the states involved in this litigation bordering the Gulf of Mexico.

3. Oceana's primary mission is to protect and restore the abundance of our world's oceans by winning science-based policies that stop overfishing, habitat destruction, pollution, and the killing of threatened species. Oceana's Climate and Energy Campaign uses science and advocacy to drive policies aimed at stopping climate change, with a focus on preventing offshore oil drilling, preventing seismic airgun blasting, and promoting responsible offshore wind energy.

4. Oceana's staff and members are committed to protecting our coasts from the dangers of offshore oil drilling. Oceana has been campaigning for clean energy for nearly two decades, achieving major victories through legal, policy, and grassroots advocacy.

5. Oceana's staff have put significant resources and effort into advocating for permanent protections from offshore oil and gas drilling and supporting the Biden Administration's leasing pause. Oceana works hand in hand with business alliances on the Atlantic, Florida Gulf, and Pacific coasts. This work has helped obtain bipartisan opposition to offshore oil and gas drilling from more than 380 municipalities and over 2,300 elected local, state, and federal officials.

6. Oceana also joined litigation challenging incidental harassment authorizations issued by the National Marine Fisheries Service for seismic airgun blasting to search the Atlantic Ocean for offshore petroleum deposits, a precursor to offshore drilling. This litigation resulted in a victory for marine species and the Atlantic coast, with the incidental harassment authorizations expiring while the litigation forced the Bureau of Ocean Energy Management to rethink the legality of issuing final exploration permits.

7. In January of 2021, shortly before the leasing was announced, Oceana published a report finding that permanent offshore drilling protections could prevent over 19 billion tons of greenhouse gas emissions and more than \$720 billion in damages to people, property, and the environment.¹ Once the Biden Administration announced the leasing pause, Oceana made significant efforts to support the leasing pause through media outreach and encouraging our partners and supporters to publicly thank President Biden for taking decisive action.

8. Oceana's years of education, outreach, and advocacy have dramatically shifted public opinion on offshore oil and gas drilling.

9. Oceana's members have been heavily engaged in opposing offshore oil drilling. In 2018, thousands of Oceana members and supporters submitted individual comments opposing the inclusion of new lease sales in the Atlantic, Pacific, and Arctic Oceans, as well as the Eastern Gulf of Mexico in the 2019–2024 Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program. In 2021, over 13,000 members and supporters signed a petition thanking President Biden for the leasing pause at issue in this case.

10. Oceana's staff and members use and enjoy the coast and our oceans, including through activities like fishing, swimming, snorkeling, scuba diving, boating, and wildlife viewing. The health of our oceans is critical to the enjoyment of these activities. Dirty and dangerous offshore oil and gas presents risk to coastal and marine environments at every stage of development. Through its normal operations, offshore drilling pollutes our coasts and leads to hundreds of spills every year, threatening coastal communities that rely on clean air and water, including Oceana's staff and members. The dangers of oil and gas development are evident from the BP *Deepwater Horizon* disaster. An Oceana report from 2020, marking 10 years since the

¹ See Oceana, *Offshore Drilling Fuels the Climate Crisis and Threatens the Economy* (Jan. 2021) https://usa.oceana.org/sites/default/files/2021/01/27/final_climate_economy_fact_sheet_m1_doi.pdf

disaster, found that the oil spill reduced popular recreational activities, such as boating, fishing, and beach visits, which translated to a loss of more than \$500 million to the recreational industry.²

11. Oceana's staff and members would also be impacted by the climate change impacts of offshore oil and gas leasing and development. Climate change is an existential threat to our oceans and the people and communities who depend on them. Human-caused emissions of carbon dioxide and other greenhouse gases are causing ocean warming, acidification, oxygen loss, and decreased fish production.

12. The warming ocean, with increasingly frequent and intense marine heatwaves like those recently experienced in the Northeast Pacific and Gulf of Maine will continue to affect marine life with impacts to fisheries, food, and human communities. The Gulf of Mexico, where a majority of offshore drilling occurs, has also seen the dire impacts of climate change, with more frequent and stronger hurricanes, decreases in populations of fish and marine mammals, and increases in incidents of red tide.

13. Climate change models project significant changes throughout the ocean over the coming century with predicted declines in productivity, species range shifts, and habitat loss. For example, climate change and warming oceans will be detrimental to kelp forests, eel grass, shallow-coral reefs, and cold-water coral ecosystems that are essential habitats for many fish populations. Climate change is resulting in increasingly intense and extreme weather, pushing dangerous storm surges farther inland and expanding their deadly and costly impact. These

² See Oceana, *Hindsight 2020: Lessons We Cannot Ignore From the BP Disaster* (Apr. 2020), https://usa.oceana.org/sites/default/files/2020/04/14/lessonswecannotignorefromthebpdisaaster_oceanareport.pdf


impacts from climate change would directly harm Oceana's staff and members who live near the coast, rely on ocean ecosystems for their livelihoods, and use the ocean for recreation.

14. Oceana and its staff and members would benefit from the pause on new leasing. The pause in new leasing is critical to ensure that the government can take a hard look at all of the impacts and opposition to offshore oil and gas drilling. The facts are clear, and once a thorough analysis is conducted, it will be clear to the federal government that we cannot afford to saddle our nation with additional climate pollution or the unrelenting threat of an oil disaster that could devastate our ocean and coastal communities.

15. Oceana's staff and members would be directly harmed if the leasing pause were invalidated. The federal government would be forced to carry out leases in offshore waters without adequate protective measures or an adequate analysis of the harms posed by additional offshore drilling. This would put coastal communities and the marine environment at risk of oil spills and the increased impacts of climate change, affecting people, property, and recreational opportunities, including for Oceana's staff and members. Additionally, this may require the government to claw back leases it later concludes should not have been sold.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 20, 2021.



Jacqueline Savitz